

# Exhibit C



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# Transcript of Lamar Horton

**Date:** February 21, 2018

**Case:** UMG -v- Grande

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Transcript of Lamar Horton  
Conducted on February 21, 2018

1 (1 to 4)

1	3
1 IN THE UNITED STATES DISTRICT COURT	1 A P P E A R A N C E S
2 FOR THE WESTERN DISTRICT OF TEXAS	2 ON BEHALF OF THE PLAINTIFFS:
3 AUSTIN DIVISION	3 PHILIP J. O'BEIRNE, ESQUIRE
4 - - - - - x	4 JONATHAN E. MISSNER, ESQUIRE
5 UMG RECORDINGS, INC., :	5 STEIN MITCHELL CIPOLLONE BEATO & MISSNER LLP
6 et al., :	6 1100 Connecticut Avenue, NW, Suite 1100
7 Plaintiffs, :	7 Washington, DC 20036
8 vs. : Civil Action No.	8 (202) 737-7777
9 GRANDE COMMUNICATIONS : 1:17-cv-00365-LY	9 pobeirne@steinmitchell.com
10 NETWORKS LLC and :	10 jmissner@steinmitchell.com
11 PATRIOT MEDIA :	11
12 CONSULTING, LLC, :	12 ON BEHALF OF THE DEFENDANTS:
13 Defendants. :	13 ZACHARY C. HOWENSTINE, ESQUIRE
14 - - - - - x	14 MAGGIE SZEWCZYK, ESQUIRE
15 Deposition of LAMAR HORTON	15 ARMSTRONG TEASDALE LLP
16 Austin, Texas	16 7700 Forsyth Boulevard, Suite 1800
17 Wednesday, February 21, 2018	17 St. Louis, Missouri 63105
18 10:06 a.m.	18 (314) 621-5070
19	19 zhowenstine@armstrongteasdale.com
20	20 mszewczyk@armstrongteasdale.com
21	21
22	22 ALSO PRESENT:
23 Job No.: 178593	23 TOM KRAUSE, Videographer
24 Pages: 1 - 303	24
25 Reported By: Candice Andino, TX CSR No. 9332, RMR	25
2	4
1 Deposition of LAMAR HORTON, held at the offices of:	1 C O N T E N T S
2	2 EXAMINATION OF LAMAR HORTON PAGE
3	3 BY MR. O'BEIRNE 10
4	4
5 KELLY HART & HALLMAN LLP	5 E X H I B I T S
6 303 Colorado Street, Suite 2000	6 (Attached to transcript.)
7 Austin, Texas 78701	7 HORTON DEPOSITION EXHIBITS PAGE
8 (512) 495-6400	8 Exhibit 51 Notice of Deposition of Lamar Horton 10
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12	12 Exhibit 53 Document entitled "DMCA Policy and Procedure" (GRANDE0002050 - 0002056) 50
13 Pursuant to notice, before Candice Andino,	13
14 Certified Shorthand Reporter in and for the State of	14 Exhibit 54 Defendant Grande Communications Networks LLC's Third Amended Objections and Responses to Plaintiffs' First Set of Interrogatories
15 Texas.	15
16	16 Exhibit 55 Email from Jerry Horne to Emily Buck and Lisa Tyler, dated April 14, 2017 (GRANDE0816590 - 0816591) 64
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19	19 Exhibit 56 Email from Stephanie Christianson to Lamar Horton, James Jordan, Richard Fogle, Lars Christianson, Jimmy Quigley, and Robert Creel, dated April 14, 2017 (GRANDE0813928 - 0813931) 70
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4 (13 to 16)

13	<p>1 Q. Is that fair?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. We will promptly --</p> <p>4 <b>A. I will say I'm starting to lose my voice, so I</b></p> <p>5 <b>may have to repeat myself a few times if it's not --</b></p> <p>6 Q. No problem.</p> <p>7 <b>A. -- clear. Just let me know.</b></p> <p>8 Q. Yeah, no problem. And I'm sure the</p> <p>9 videographer and the court reporter will let us know if</p> <p>10 we need to speak up or slow down.</p> <p>11 <b>A. Okay.</b></p> <p>12 Q. I'm occasionally --</p> <p>13 <b>A. Sure.</b></p> <p>14 Q. -- told to slow down. And, by "occasionally,"</p> <p>15 I mean every time. And we will, inevitably, talk over</p> <p>16 each other and interrupt each other, but let's try our</p> <p>17 best to go one at a time.</p> <p>18 <b>A. Uh-huh.</b></p> <p>19 Q. Great. And give yes-or-no answers or -- or</p> <p>20 verbal answers.</p> <p>21 I think you stated, at the beginning, your</p> <p>22 name was put on the record. But just to be clear, could</p> <p>23 you state your full name for the record.</p> <p>24 <b>A. Lamar Horton.</b></p> <p>25 Q. No middle name?</p>	15
14	<p>1 <b>A. Alexander. Lamar Alexander Horton.</b></p> <p>2 Q. And what's your residence?</p> <p>3 <b>A. 249 Hamburg Avenue, New Braunfels, Texas.</b></p> <p>4 Q. How far is New Braunfels from Austin?</p> <p>5 <b>A. From Austin? About 45 minutes.</b></p> <p>6 Q. So you're local?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Okay. A couple other kind of housekeeping</p> <p>9 matters. If you need to take a break for any reason --</p> <p>10 you mentioned you losing your voice -- or, you know, if</p> <p>11 you're not feeling well or you need to go to the</p> <p>12 bathroom or something, just let me know and I'll do my</p> <p>13 best to accommodate if there's a natural time we can</p> <p>14 take a break.</p> <p>15 <b>A. Okay.</b></p> <p>16 Q. I don't mean to probe, so without giving any</p> <p>17 details, I presume you're not on any medication or</p> <p>18 anything that would impact your ability to recall or --</p> <p>19 or to testify fully today?</p> <p>20 <b>A. No.</b></p> <p>21 Q. "No" meaning "yes," you are not on such?</p> <p>22 <b>A. I am not.</b></p> <p>23 Q. Right. So is there any reason why you can't</p> <p>24 provide full and complete testimony in response to this</p> <p>25 notice today, that you're aware of?</p>	16

1 **A. No.**

2 Q. Okay. I'm going to presume, if you answer my

3 question, that you understood it.

4 Is that fair?

5 **A. Yes.**

6 Q. So if any of the questions I ask you, you don't

7 understand or you'd like me to clarify, please do so.

8 **A. Okay.**

9 Q. And, otherwise, I'll presume you understood it

10 and that your answer was based on my question.

11 **A. Okay.**

12 Q. What is your current occupation and job title?

13 **A. Vice president of network engineering and**

14 **operations.**

15 Q. For who?

16 **A. Grande Communications.**

17 Q. How long have you had that position?

18 **A. That title? Since 2009.**

19 Q. So you're distinguishing between the title and

20 the position. So the position's remained the same, but

21 the title changed over time?

22 **A. My roles and responsibilities have changed in**

23 **the company since I've been employed.**

24 Q. Okay.

25 **A. I've been the vice president -- in the position**

1 **of vice president since 2009.**

2 Q. So, since 2009, you've been the VP for network

3 engineering and operations?

4 **A. Uh-huh.**

5 Q. That's a "yes"?

6 **A. Yes.**

7 Q. And then the responsibilities that you had in

8 that role might have changed over time from 2009 to now,

9 but the title was the same?

10 **A. Sure. Yes.**

11 Q. Taking a step back, if you could just start

12 with your educational background, and then we'll work

13 through the positions you had up until today.

14 **A. Sure.**

15 Q. So you -- tell me: Did you go to high school

16 around here?

17 **A. I went to high school in San Antonio, right**

18 **outside of San Antonio.**

19 Q. Okay.

20 **A. Graduated 1993.**

21 Q. After high school, what did you do?

22 **A. I went to college at Texas State University for**

23 **a couple years and then graduated from DeVry University**

24 **in Dallas in '98.**

25 Q. Where is Texas State?

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11 (41 to 44)

41	<p>1 <b>answer that affirmatively.</b></p> <p>2 Q. So, sitting here, you're -- you're not aware of</p> <p>3 times where Grande customer support personnel will reach</p> <p>4 out to make affirmative contact with a customer about an</p> <p>5 issue?</p> <p>6 <b>A. Can you define what "affirmative" means in your</b></p> <p>7 <b>question.</b></p> <p>8 Q. Grande calls the customer, not the customer</p> <p>9 calling Grande.</p> <p>10 <b>A. I can't answer that question. I would be</b></p> <p>11 <b>speculating. I would be guessing if I answered that</b></p> <p>12 <b>question. I don't know.</b></p> <p>13 Q. In your role as the DMCA agent, what</p> <p>14 responsibilities do you have over any processes whereby</p> <p>15 Grande customer service personnel contact customers?</p> <p>16 <b>A. In that capacity, I don't have that</b></p> <p>17 <b>responsibility.</b></p> <p>18 Q. Who, other than you, that you're aware of,</p> <p>19 would have better knowledge about any process underneath</p> <p>20 Grande's DMCA procedures that would involve a customer</p> <p>21 service employee reaching out to a customer about a DMCA</p> <p>22 issue?</p> <p>23 MR. HOWENSTINE: Objection. Vague.</p> <p>24 <b>A. Only the call center management team could</b></p> <p>25 <b>explain when we reach out affirmatively to contact a</b></p>	43	<p>1 whomever is running Compass to ensure that they have the</p> <p>2 most updated information in a way that they can</p> <p>3 effectively communicate it to the customers?</p> <p>4 <b>A. Not that I'm aware of, no.</b></p> <p>5 Q. So do you ever provide information to the</p> <p>6 Compass system and then get questions back, "We don't</p> <p>7 understand what this means. What do we tell people if</p> <p>8 they call and ask, you know, X, Y, Z?"</p> <p>9 <b>A. Could you restate the question?</b></p> <p>10 Q. Sure.</p> <p>11 I'm just trying to understand if there is</p> <p>12 an iterative back-and-forth process between people</p> <p>13 providing the information that's going into Compass and</p> <p>14 the people using the Compass information to talk to the</p> <p>15 customers.</p> <p>16 <b>A. I would -- I would state it as the call center</b></p> <p>17 <b>manages the content that's in Compass. That -- that's</b></p> <p>18 <b>the call center's system. If they see the need to</b></p> <p>19 <b>populate content, they would reach out to us, if it was</b></p> <p>20 <b>our area, to say, "Can you help us develop an FAQ for</b></p> <p>21 <b>this?" or "Can you give us some information that</b></p> <p>22 <b>pertains to that?"</b></p> <p>23 Q. So when they reach out to you and ask you to</p> <p>24 help them populate content in Compass, what is the</p> <p>25 process whereby you provide the content that they asked</p>
42	<p>1 <b>customer.</b></p> <p>2 Q. (BY MR. O'BEIRNE) Who is the customer service</p> <p>3 management team?</p> <p>4 <b>A. That would be Robert Creel and/or his</b></p> <p>5 <b>management, Dawn Blydenburgh.</b></p> <p>6 Q. What -- strike that.</p> <p>7 In your role as the VP of network</p> <p>8 engineering, do you or your team provide information</p> <p>9 that is input into the custom -- sorry. I misspoke.</p> <p>10 Strike that.</p> <p>11 In your role as the VP of network</p> <p>12 engineering, do you or people you supervise provide</p> <p>13 information that is put into the Compass system for use</p> <p>14 by customer service employees?</p> <p>15 <b>A. Generally speaking, yes.</b></p> <p>16 Q. What kinds of information do you provide that</p> <p>17 is put into Compass for the use of the customer service</p> <p>18 employees?</p> <p>19 <b>A. Typically, it would be technical information,</b></p> <p>20 <b>such as these modems work correctly for these products</b></p> <p>21 <b>or, you know, maybe helping develop an FAQ for how to</b></p> <p>22 <b>explain something to a customer that's tech- -- very</b></p> <p>23 <b>technical. Typically, it's product related or product</b></p> <p>24 <b>support related.</b></p> <p>25 Q. Is there a process whereby you work with</p>	44	<p>1 you for?</p> <p>2 <b>A. I would generalize it as there is no process,</b></p> <p>3 <b>no defined process. It could be a phone call. It could</b></p> <p>4 <b>be a hallway conversation. It could be an email</b></p> <p>5 <b>request. It could be anything.</b></p> <p>6 Q. So -- I'm just trying to understand. So, as an</p> <p>7 example, somebody who's -- has responsibility over</p> <p>8 Compass might see you in the hall and say, "Hey, we're</p> <p>9 hearing this abbreviation. We want to have an entry in</p> <p>10 it in Compass so we can tell customers what it means.</p> <p>11 What does it mean?"</p> <p>12 And, if you know what it means, you might</p> <p>13 say, "Oh, it means such and such."</p> <p>14 <b>A. That's a fair example.</b></p> <p>15 Q. Or it might be a formal process where they send</p> <p>16 a written request describing the input that they need</p> <p>17 for the system and your team assesses it and provides</p> <p>18 information?</p> <p>19 <b>A. That could be fair as well.</b></p> <p>20 Q. And it could be anywhere in between?</p> <p>21 <b>A. Sure. Yes.</b></p> <p>22 Q. What input have you had into Compass</p> <p>23 information, including frequently asked questions, about</p> <p>24 Grande's DMCA policy?</p> <p>25 <b>A. I don't recall having any involvement with</b></p>

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12 (45 to 48)

<p style="text-align: right;">45</p> <p>1 <b>that.</b></p> <p>2 Q. So, sitting here today, as the DMCA agent, what</p> <p>3 can you tell me about what is in the Compass system to</p> <p>4 answer frequently asked questions from customers about</p> <p>5 Grande's DMCA policy?</p> <p>6 <b>A. Can you restate that, please?</b></p> <p>7 Q. Sure.</p> <p>8 Sitting here today, as the DMCA agent, what</p> <p>9 can you tell me about the information that is in Compass</p> <p>10 to answer frequently asked questions from customers</p> <p>11 about Grande's DMCA policy?</p> <p>12 <b>A. I don't know what's currently in the system. I</b></p> <p>13 <b>couldn't quantify that. I seem to recall at one time we</b></p> <p>14 <b>had an article that explained to customers -- excuse me.</b></p> <p>15 <b>Let me restate that -- explained to the call center</b></p> <p>16 <b>agent, if a customer receives a letter like this, this</b></p> <p>17 <b>is what this means, in a way to explain to the customer</b></p> <p>18 <b>and get them to the right team to support that customer.</b></p> <p>19 Q. What is your understanding of your</p> <p>20 responsibilities as the DMCA agent?</p> <p>21 <b>A. My understanding of being the DMCA agent is</b></p> <p>22 <b>that I am a point of contact for the outside world of</b></p> <p>23 <b>copyright holders to provide notice or a contact to</b></p> <p>24 <b>reach out to.</b></p> <p>25 Q. Do you have any -- setting -- strike that.</p>	<p style="text-align: right;">47</p> <p>1 <b>A. I do not.</b></p> <p>2 Q. Do you review notices sent to Grande -- strike</p> <p>3 that.</p> <p>4 Do you review information that Grande</p> <p>5 receives from the outside world pursuant to the DMCA</p> <p>6 policy?</p> <p>7 MR. HOWENSTINE: Objection. Vague.</p> <p>8 <b>A. I agree. I don't understand what you're</b></p> <p>9 <b>asking.</b></p> <p>10 Q. (BY MR. O'BEIRNE) Sure.</p> <p>11 So I understood you to testify that you --</p> <p>12 your responsibility is to be a point of contact to the</p> <p>13 outside world, for them, to provide information.</p> <p>14 Is that fair?</p> <p>15 <b>A. Generally speaking, yes.</b></p> <p>16 Q. Okay. So whatever you meant by get information</p> <p>17 from the outside world as a point of contact, I'm asking</p> <p>18 you: What review do you do of information that you</p> <p>19 receive as the point of contact to the outside world for</p> <p>20 DMCA purposes?</p> <p>21 <b>A. To the best of my knowledge, I've never</b></p> <p>22 <b>received anything directly from an outside entity about</b></p> <p>23 <b>DMCA.</b></p> <p>24 Q. Is it your understanding that Grande has</p> <p>25 received information about the DMCA but not you</p>
<p style="text-align: right;">46</p> <p>1 Setting aside the role of a point of</p> <p>2 contact to receive information, what responsibilities do</p> <p>3 you understand you have, as the DMCA agent, to monitor</p> <p>4 or otherwise oversee DMCA procedures internal to Grande?</p> <p>5 <b>A. I don't believe that I have that</b></p> <p>6 <b>responsibility.</b></p> <p>7 Q. What training did you receive in connection</p> <p>8 with being made the DMCA agent?</p> <p>9 <b>A. I did not receive any training.</b></p> <p>10 Q. What description was provided to you as to what</p> <p>11 the role would entail?</p> <p>12 <b>A. As --</b></p> <p>13 MR. HOWENSTINE: And I'll jump in and</p> <p>14 caution you. To the extent it involves communications</p> <p>15 with attorneys, inside attorneys, you should not</p> <p>16 disclose any of those communications.</p> <p>17 Q. (BY MR. O'BEIRNE) Let me rephrase the</p> <p>18 question.</p> <p>19 Other than any legal advice provided to you</p> <p>20 by counsel, what explanation was provided to you, in</p> <p>21 connection with your being made the DMCA agent, as to</p> <p>22 the responsibilities you would have?</p> <p>23 <b>A. I don't -- nothing.</b></p> <p>24 Q. Do you attend periodic internal DMCA meetings</p> <p>25 in your role as the DMCA agent?</p>	<p style="text-align: right;">48</p> <p>1 personally?</p> <p>2 <b>A. I don't understand that question. What is</b></p> <p>3 <b>about the DMCA?</b></p> <p>4 Q. Have you ever received a notice of alleged</p> <p>5 infringement -- copyright infringement, personally?</p> <p>6 <b>A. No.</b></p> <p>7 Q. Are you aware that Grande has received notices</p> <p>8 of alleged copyright infringement in the last year?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. And in 2016?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. 2015?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. What review do you conduct of notices of</p> <p>15 alleged copyright infringement received by Grande in</p> <p>16 your role as the DMCA agent?</p> <p>17 <b>A. Are you asking do I review all notices that</b></p> <p>18 <b>come through the system or come into Grande?</b></p> <p>19 Q. My question is: What review do you conduct of</p> <p>20 notices of alleged copyright infringement received by</p> <p>21 Grande in your role as the DMCA agent?</p> <p>22 <b>A. I do not review individual copyright notices.</b></p> <p>23 Q. Do you review reports or summaries of notices</p> <p>24 that have been received?</p> <p>25 <b>A. Only upon periods of reviewing the system or a</b></p>

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19 (73 to 76)

<p style="text-align: right;">73</p> <p>1 red.</p> <p>2 Do you see that?</p> <p>3 <b>A. Numbers in red.</b></p> <p>4 Q. Yes, sir. Number one --</p> <p>5 <b>A. Oh, yes.</b></p> <p>6 Q. -- letter or email.</p> <p>7 <b>A. Yes. Yes.</b></p> <p>8 Q. So the outline proceeds, underneath "Need to</p> <p>9 build communication procedure" (as read): Number 1,</p> <p>10 letter or email.</p> <p>11 Do you see that?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. And it states (as read): Current process can</p> <p>14 be followed, just need to ensure letter has been mailed.</p> <p>15 Do you see that?</p> <p>16 <b>A. Yep.</b></p> <p>17 Q. Do you recall discussions about whether or not</p> <p>18 letters were actually not being mailed, even though the</p> <p>19 system was calling for them to be mailed?</p> <p>20 <b>A. That's the wrong context. The context is, as</b></p> <p>21 <b>it gets to the point of working through a repeat</b></p> <p>22 <b>violation, ensuring that a letter was received by the</b></p> <p>23 <b>customer so that we are not making any assumptions and</b></p> <p>24 <b>any mistakes because it's leading to a customer</b></p> <p>25 <b>communication.</b></p>	<p style="text-align: right;">75</p> <p>1 Underneath "Contact customer by phone," it</p> <p>2 states (as read): Determination of contact built on</p> <p>3 Excess Violations2 SSRS report.</p> <p>4 Do you see that?</p> <p>5 <b>A. I do.</b></p> <p>6 Q. An SSRS report is a -- is a document generated</p> <p>7 by Grande's information system; correct?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. And this is referring to a report reflecting</p> <p>10 Grande customers that Grande has evidence have excessive</p> <p>11 violations of copyright infringement.</p> <p>12 MR. HOWENSTINE: Objection. Vague.</p> <p>13 Confusing.</p> <p>14 <b>A. I can only assume that's accurate, yes.</b></p> <p>15 Q. (BY MR. O'BEIRNE) Okay.</p> <p>16 <b>A. But I don't know.</b></p> <p>17 Q. Well, you just testified you were familiar with</p> <p>18 the context of this conversation regarding making</p> <p>19 sure --</p> <p>20 <b>A. I am. The particular report.</b></p> <p>21 Q. I'm sorry. Let me finish the question.</p> <p>22 You testified you were familiar with the</p> <p>23 context of what it meant to ensure the letter has been</p> <p>24 mailed; right?</p> <p>25 <b>A. Yes.</b></p>
<p style="text-align: right;">74</p> <p>1 Q. Okay. So you remember what this means?</p> <p>2 <b>A. I -- I -- I know the context of what this is,</b></p> <p>3 <b>yes.</b></p> <p>4 Q. Okay. How do you know the context of what this</p> <p>5 is?</p> <p>6 <b>A. Through general discussions.</b></p> <p>7 Q. With whom?</p> <p>8 <b>A. Various Grande employees.</b></p> <p>9 Q. Okay. And your understanding of what that</p> <p>10 means is need to ensure the letter's been mailed. If</p> <p>11 the company's going to take action on the letter that</p> <p>12 was sent to a customer, you want to make sure the letter</p> <p>13 went out to the customer?</p> <p>14 <b>A. Correct.</b></p> <p>15 Q. Is that because there were times where the</p> <p>16 company went to take action against a customer based on</p> <p>17 a letter that you thought went out and then the customer</p> <p>18 said, "Hey, I never received that"?</p> <p>19 <b>A. Not to my knowledge, but I -- I believe the</b></p> <p>20 <b>intention was to avoid that particular scenario.</b></p> <p>21 Q. Number two, underneath "Communication</p> <p>22 Procedure" (as read): Contact customer by phone.</p> <p>23 Do you see that?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. And -- strike that.</p>	<p style="text-align: right;">76</p> <p>1 Q. Your understanding is that the excess</p> <p>2 violations to SSRS report is a report generated by</p> <p>3 Grande, containing information about customers that</p> <p>4 Grande has determined have received an excessive amount</p> <p>5 of copyright infringement notices.</p> <p>6 MR. HOWENSTINE: Objection. Vague.</p> <p>7 <b>A. Yes; however, I cannot explain the details of</b></p> <p>8 <b>that report.</b></p> <p>9 (Exhibit 57 marked.)</p> <p>10 Q. (BY MR. O'BEIRNE) I'm handing you PX 57.</p> <p>11 Do you see this is a binder-clipped</p> <p>12 printout of an Excel spreadsheet?</p> <p>13 Is that fair?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. I'm certainly not asking you to read this</p> <p>16 entire document, but I want to ask you some questions</p> <p>17 about it and first put a couple things in the record.</p> <p>18 You'll turn to the last page and see, if</p> <p>19 you would, please, that the last page is a piece of</p> <p>20 paper with a Bates number on the bottom, GRANDE0000155.</p> <p>21 Do you see that?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. And then the text in the middle says (as read):</p> <p>24 This document was provided in native format upon</p> <p>25 request.</p>



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20 (77 to 80)

77	<p>1 <b>A. Yes.</b></p> <p>2 Q. Do you see that?</p> <p>3 So you can't Bates-stamp an Excel</p> <p>4 spreadsheet because it's produced in native format, so a</p> <p>5 placeholder is given to us with a Bates number to show</p> <p>6 that this was produced by Grande. I represent to you</p> <p>7 that that's what occurred in this case. Okay?</p> <p>8 <b>A. Okay.</b></p> <p>9 Q. So this is a printout of the Excel spreadsheet</p> <p>10 that was produced at GRANDE0000155.</p> <p>11 Do you understand?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Now, looking at Exhibit 57 -- Plaintiffs'</p> <p>14 Exhibit 57 -- I'll start over.</p> <p>15 Looking at Plaintiffs' Exhibit 57, it says,</p> <p>16 at the bottom middle (as read): DMCA Excessive</p> <p>17 ViolationsV2 from 1/1/2017 to 1/31/2017.</p> <p>18 Do you see that?</p> <p>19 <b>A. I do.</b></p> <p>20 Q. This is one of the SSRS Excess Violations2</p> <p>21 report -- reports that was being mentioned in the</p> <p>22 touchpoint process outline; right?</p> <p>23 MR. HOWENSTINE: Objection. Calls for</p> <p>24 speculation. I believe he already testified that he</p> <p>25 wasn't familiar with the details of those reports.</p>	79	<p>1 therefore, it ended up being a whole second -- section</p> <p>2 of the document but that that natively appears next to</p> <p>3 the C column.</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Okay. So, staying there, you'll agree with me</p> <p>6 that the last line that has a column A, B, and C, the</p> <p>7 number of that line is 5,337?</p> <p>8 <b>A. It is.</b></p> <p>9 Q. So there appear to be 5,337 entries on this</p> <p>10 DMCA Excessive ViolationsV2 report.</p> <p>11 <b>A. It appears to be, yes.</b></p> <p>12 Q. If you go back to the first page, the column</p> <p>13 headings are "Account Days" and "Weighted Infringement."</p> <p>14 Do you see that?</p> <p>15 <b>A. I do.</b></p> <p>16 Q. And then, underneath Account, there is a column</p> <p>17 with numbers, all of which have the same number of</p> <p>18 digits in it.</p> <p>19 Do you see that?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Do you understand those to be customer account</p> <p>22 numbers?</p> <p>23 <b>A. I do.</b></p> <p>24 Q. And then there's a number of days associated</p> <p>25 with each customer account.</p>
78	<p>1 Q. (BY MR. O'BEIRNE) You can go ahead and answer.</p> <p>2 <b>A. It appears to be.</b></p> <p>3 MR. O'BEIRNE: I'd ask counsel just to put</p> <p>4 a form objection on and avoid speaking objections.</p> <p>5 Q. (BY MR. O'BEIRNE) You would agree with me</p> <p>6 that, if you turn to the last Excel page, which is the</p> <p>7 page before the native page, you see there the end of</p> <p>8 the Excel spreadsheet columns?</p> <p>9 <b>A. I do.</b></p> <p>10 Q. And this document appears to have 5,337 lines</p> <p>11 in it. Hold on. Okay. Let's take a step back.</p> <p>12 Do you see that, on page 1 of Plaintiffs'</p> <p>13 Exhibit 57, there's three columns, A, B, and C?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Please turn for me -- it's about halfway</p> <p>16 through the document -- you'll see the end of the line</p> <p>17 numbers is 5,337, and there's those three full columns,</p> <p>18 A, B, and C, reflected there.</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. And then, starting after that, the next page</p> <p>21 has a column D, starting over at 1.</p> <p>22 Do you see that?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. I'll represent to you, somewhat frustratingly,</p> <p>25 the D column was not printed next to the C columns, and,</p>	80	<p>1 Do you see that?</p> <p>2 <b>A. I see that column, yes.</b></p> <p>3 Q. And then the column next to that, Weighted</p> <p>4 Infringement.</p> <p>5 <b>A. Uh-huh.</b></p> <p>6 Q. You -- you see that column there?</p> <p>7 <b>A. I do.</b></p> <p>8 Q. What does "weighted infringement" mean?</p> <p>9 <b>A. I don't -- I don't know the answer to that</b></p> <p>10 <b>question. I can generically tell you that this was our</b></p> <p>11 <b>attempt at trying to develop a -- a scoring method that</b></p> <p>12 <b>aligned with our management team's executed plan.</b></p> <p>13 Q. Executed plan to deal with repeat infringers on</p> <p>14 your network?</p> <p>15 <b>A. Correct.</b></p> <p>16 Q. Tracking customers by number and then</p> <p>17 associating a weighted infringement score and a number</p> <p>18 of days for which they've been tracked in some way?</p> <p>19 <b>A. Yes, some type of methodology.</b></p> <p>20 Q. And this is the report from January 1st, 2017,</p> <p>21 to January 31st, 2017?</p> <p>22 <b>A. It appears so.</b></p> <p>23 Q. So it's a capability of the SR -- strike that.</p> <p>24 It's a capability of Grande's system to</p> <p>25 issue reports from the SSRS system for a given month or</p>



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21 (81 to 84)

<p style="text-align: right;">81</p> <p>1 other period of time?</p> <p>2 MR. HOWENSTINE: Objection. Calls for</p> <p>3 speculation.</p> <p>4 <b>A. Yes. I don't know how this report was created,</b></p> <p>5 <b>so I can't answer that.</b></p> <p>6 Q. (BY MR. O'BEIRNE) At the bottom of the first</p> <p>7 page, you see the report states it was executed at</p> <p>8 3:11 p.m., on April 13, 2017? Do you see that?</p> <p>9 <b>A. I do.</b></p> <p>10 Q. And that's the day before the Friday call</p> <p>11 dealing with customers in violation of certain copyright</p> <p>12 rules that we looked at in PX 55; right?</p> <p>13 <b>A. It would appear so, yes.</b></p> <p>14 Q. And PX 55 references an Excess Violations2 SSRS</p> <p>15 report; correct?</p> <p>16 <b>A. It does.</b></p> <p>17 (Exhibit 58 marked.)</p> <p>18 Q. (BY MR. O'BEIRNE) I'm handing you Plaintiffs'</p> <p>19 Exhibit 58. This is also a printout of an Excel</p> <p>20 spreadsheet produced in this case, with a Bates number</p> <p>21 on the last page; correct?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. And this is the DMCA Excessive Violations</p> <p>24 Report from October 1st, 2016, through December 31st,</p> <p>25 2016.</p>	<p style="text-align: right;">83</p> <p>1 Do you see that?</p> <p>2 <b>A. I do.</b></p> <p>3 Q. And then, when you turn to the next page, this</p> <p>4 is the second sheet in the native Excel that was</p> <p>5 produced to us, which doesn't bear any description on</p> <p>6 the bottom.</p> <p>7 Do you see that?</p> <p>8 <b>A. I do.</b></p> <p>9 Q. Take my binder clip off there.</p> <p>10 And you'll see that the count starts</p> <p>11 over -- the row count starts over at 1 on this first</p> <p>12 page of the second sheet.</p> <p>13 Do you see that?</p> <p>14 <b>A. I do.</b></p> <p>15 Q. I'm going to talk to you first about the first</p> <p>16 sheet, so if you could just, you know, put something in</p> <p>17 there to hold the place, and that way we can try to</p> <p>18 minimize the flipping back and forth that we both have</p> <p>19 to do.</p> <p>20 This report also has the column headings</p> <p>21 "Account Days" and "Weighted Infringement."</p> <p>22 Do you see that?</p> <p>23 <b>A. I do.</b></p> <p>24 Q. This also -- D has "Status."</p> <p>25 Do you see that?</p>
<p style="text-align: right;">82</p> <p>1 <b>A. It would appear so.</b></p> <p>2 Q. And it also states it was executed at</p> <p>3 4/13/2017, 2:07 p.m.</p> <p>4 <b>A. It does.</b></p> <p>5 Q. By "also," I meant the previous exhibit we just</p> <p>6 looked at was also executed on that date. I'm not sure</p> <p>7 it was the exact same time, but this report appears to</p> <p>8 have been executed on April 13th, 2017; correct?</p> <p>9 <b>A. It appears so, yes, sir.</b></p> <p>10 Q. And this is PX 58.</p> <p>11 MR. MISSNER: Fifty-eight.</p> <p>12 Q. (BY MR. O'BEIRNE) Now, happily, column D ended</p> <p>13 up where it's supposed to be on this sheet.</p> <p>14 You see that; right?</p> <p>15 <b>A. I do.</b></p> <p>16 Q. Turn with me, if you would, please -- actually,</p> <p>17 you know what? Bear with me for one second.</p> <p>18 So I represent to you PX 58 had two sheets</p> <p>19 in it, a first sheet and a second sheet. And, again,</p> <p>20 not being able to -- to have it Bates-stamped or have</p> <p>21 that be reflected in some way, if you turn halfway</p> <p>22 through, about halfway through the document, until you</p> <p>23 get to the row number -- rows numbering in the 8,000s,</p> <p>24 you'll see that the pages stop that have "Excessive</p> <p>25 Violations" written at the bottom.</p>	<p style="text-align: right;">84</p> <p>1 <b>A. I do.</b></p> <p>2 Q. And then, underneath "Status," there's "Blank</p> <p>3 equals active," "A equals active," and "Star equals</p> <p>4 unknown."</p> <p>5 Do you see that?</p> <p>6 <b>A. I do.</b></p> <p>7 Q. And I think D on the other one said the same</p> <p>8 thing. We just didn't look at it.</p> <p>9 And, just like PX 57, PX 58 has Grande</p> <p>10 customer account numbers underneath column A; right?</p> <p>11 <b>A. It does.</b></p> <p>12 Q. With a number of days reflected in</p> <p>13 column B; right?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. And a weighted infringement assessment in</p> <p>16 column C?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. And, if you turn to the last page of this first</p> <p>19 sheet, Grande's tracking 9,014 customers on its DMCA</p> <p>20 excessive violations from October 1st, 2016, through</p> <p>21 December 31st, 2016, report; correct?</p> <p>22 MR. HOWENSTINE: Objection. Calls for</p> <p>23 speculation.</p> <p>24 <b>A. It appears so.</b></p> <p>25 Q. (BY MR. O'BEIRNE) And this was also generated</p>

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22 (85 to 88)

85	<p>1 the day before the April 14th, 2017, conference</p> <p>2 regarding dealing with customers in violation of certain</p> <p>3 copyright rules; correct?</p> <p>4 <b>A. It would appear so.</b></p> <p>5 Q. If you turn to the second sheet, the last page</p> <p>6 reveals the same number of customer account lines,</p> <p>7 9,014.</p> <p>8 Do you see that?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. And this has several more columns -- or at</p> <p>11 least seems to have two sets of the columns we've looked</p> <p>12 at, Accounts, Days, and Weighted Infringement for the</p> <p>13 fourth quarter of 2016 and for the first quarter of</p> <p>14 2017.</p> <p>15 Do you see that?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. And it appears, in the second sheet, that</p> <p>18 Grande is tracking the infringement from 2016 into 2017</p> <p>19 of 9,014 customers.</p> <p>20 MR. HOWENSTINE: Objection. Calls for</p> <p>21 speculation.</p> <p>22 <b>A. It would appear so.</b></p> <p>23 (Exhibit 59 marked.)</p> <p>24 Q. (BY MR. O'BEIRNE) I'm handing you Plaintiffs'</p> <p>25 Exhibit 59. You can put 58 aside for the time being.</p>	87	<p>1 are not row numbers on this document for some reason.</p> <p>2 If you would flip about a quarter of the way through, it</p> <p>3 changes over from having four columns with no color to</p> <p>4 having six columns in color.</p> <p>5 Do you see that?</p> <p>6 <b>A. I do.</b></p> <p>7 Q. All right. So that's the second sheet. And</p> <p>8 that appears to be the same kind of quarter-to-quarter</p> <p>9 information that we saw in the previous exhibit; right?</p> <p>10 <b>A. It appears to be, yes.</b></p> <p>11 Q. And then, if you flip -- if you turn that</p> <p>12 about -- to about three-quarters of the way through the</p> <p>13 document, the third sheet is printed in landscape.</p> <p>14 Do you see that?</p> <p>15 <b>A. I do.</b></p> <p>16 Q. And this reflects three different sets of</p> <p>17 columns -- actually, excuse me. Strike that.</p> <p>18 This third sheet has four sets of columns</p> <p>19 of account numbers with days and weighted infringement</p> <p>20 scores.</p> <p>21 Do you see that?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Appearing to be -- the first quarter of 2017 is</p> <p>24 the first one; right?</p> <p>25 <b>A. Yes.</b></p>
86	<p>1 Turn to the last page. This is also a</p> <p>2 document produced natively by Grande with a slip sheet</p> <p>3 bearing Bates number GRANDE0000194; correct?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. I'll represent to you there were three sheets</p> <p>6 in this Excel, and they appear sequentially -- printed</p> <p>7 sequentially, as they did in Exhibit 58. Let's start</p> <p>8 with the first sheet.</p> <p>9 Do you see, at the bottom of the first page</p> <p>10 of the document, this appears to be the Grande DMCA</p> <p>11 Excessive Violations report from January 1st, 2017,</p> <p>12 through March 31st, 2017? Do you see that?</p> <p>13 <b>A. I do.</b></p> <p>14 Q. And this was also executed on April 13th, 2017.</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Which is the day before the meeting we've been</p> <p>17 discussing.</p> <p>18 <b>A. Uh-huh.</b></p> <p>19 Q. That's a "yes"? Sorry.</p> <p>20 <b>A. It wasn't a question. Yes.</b></p> <p>21 Q. You would agree with me that this was executed</p> <p>22 on April 13th, 2017, which is the day before the</p> <p>23 April 14th meeting we've been discussing; correct?</p> <p>24 <b>A. It would appear so, yes.</b></p> <p>25 Q. If you would please turn to -- it appears there</p>	88	<p>1 Q. And then the second, third, and fourth columns</p> <p>2 are the January, February, and March 2017 information?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. The row numbers didn't print for some reason.</p> <p>5 I represent to you, for the record, that there are 5,331</p> <p>6 rows on the first sheet, which, obviously, you're not in</p> <p>7 a position to confirm or not, but I just wanted to put</p> <p>8 that on the record.</p> <p>9 You can put aside PX 59 for the time being.</p> <p>10 Turning back to PX 55, which is the outline</p> <p>11 underneath Jerry Horne's email.</p> <p>12 Do you see that?</p> <p>13 <b>A. I do.</b></p> <p>14 Q. Under number 2, where it references excess</p> <p>15 violations SSRS reports, it suggests comparing two</p> <p>16 iterations of report data.</p> <p>17 Do you see that?</p> <p>18 <b>A. I do.</b></p> <p>19 Q. And then A is (as read): Report covering</p> <p>20 previous three-month period to confirm higher levels of</p> <p>21 repeated offense.</p> <p>22 Do you see that?</p> <p>23 <b>A. I do.</b></p> <p>24 Q. Does it appear that the third SSR report we</p> <p>25 just looked at had such a three-month comparison in the</p>

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35 (137 to 140)

<p style="text-align: right;">137</p> <p>1 <b>A. I do know that there are time periods where</b>  2 <b>Rightscorp did not comply, but I couldn't, off the top</b>  3 <b>of my head, tell you what time periods those were.</b>  4 Q. You're not aware that one of those time periods  5 included June 2017?  6 <b>A. I'm not sure. I -- I do not know. I would</b>  7 <b>need to clarify. I would need to verify.</b>  8 Q. What's your best recollection as to when any  9 such time periods were?  10 <b>A. Going from memory, which may not be accurate,</b>  11 <b>with the implement- -- implementation of this policy, I</b>  12 <b>believe that Rightscorp was not providing the</b>  13 <b>requirements to process at the time of implementation.</b>  14 <b>What I am not a hundred percent sure of is whether there</b>  15 <b>was a time period that that changed or varied back and</b>  16 <b>forth, and I would need to confirm that.</b>  17 Q. When you say "this process," you mean the DMCA  18 policy implemented in February 2017?  19 <b>A. Yes.</b>  20 Q. In what ways do you recall that -- strike that.  21 Sitting here today, what is your  22 understanding of what ways the Rightscorp notices  23 provided at any time in 2017 failed to satisfy,  24 allegedly, the DMCA requirements in your policy?  25 <b>A. My recollection is that the -- the digital</b></p>	<p style="text-align: right;">139</p> <p>1 Q. You mentioned that Grande's system will only  2 continue to process through notices that meet the DMCA  3 policy requirements.  4 What happens to them once that assessment's  5 been made?  6 <b>A. For one that is valid or invalid?</b>  7 Q. Valid. I'm sorry. Let me ask again.  8 What is the process by which a notice that  9 has been deemed valid moves through the Rightscorp  10 system after being assigned a ticket number?  11 <b>A. The Grande system?</b>  12 Q. What is the -- I apologize. Strike that.  13 What is the process by which a notice  14 received by Grande of copyright infringement moves  15 through Grande's system after the system determines it  16 meets the requirements of the DMCA policy?  17 <b>A. At that point, the -- the notification to the</b>  18 <b>customer is automated. So it would flow through the</b>  19 <b>system we described here. That would then go to a</b>  20 <b>system that correlates who the customer is and how to</b>  21 <b>notify that customer of the alleged infringement.</b>  22 Q. And, in the early part of the implementation of  23 this policy, sometime after February 2017, that process  24 was by CSG, in paper letters still; right?  25 <b>A. That's correct.</b></p>
<p style="text-align: right;">138</p> <p>1 <b>signature requirements were not met with Rightscorp</b>  2 <b>specifically.</b>  3 Q. What do you mean "the digital signature  4 requirements"?  5 <b>A. The public key. And I'd have to review the</b>  6 <b>policy to accurately state this.</b>  7 Q. Please feel free to do so.  8 You're looking at PX 53?  9 <b>A. Yes. Yes. I -- it's the notification</b>  10 <b>requirement that Grande requires that each notification</b>  11 <b>be in a PGP format or compatible standard and must be</b>  12 <b>digitally signed to verify the identif- -- identity of</b>  13 <b>the sender. I recall that that was the requirement that</b>  14 <b>was not met specifically by Rightscorp.</b>  15 Q. When was that requirement instituted?  16 <b>A. With this policy.</b>  17 Q. February 2017?  18 <b>A. At least, yes.</b>  19 Q. So it was not a requirement under the previous  20 acceptable use policy?  21 <b>A. I do not recall whether it was in there or not,</b>  22 <b>to be honest.</b>  23 Q. That policy speaks for itself, though.  24 Whatever was in there, was in there?  25 <b>A. That's a true statement.</b></p>	<p style="text-align: right;">140</p> <p>1 Q. And then, at some point, it became OSG sending  2 electronic notices?  3 <b>A. Along with paper, if necessary.</b>  4 Q. Understood.  5 But, in both instances, it was automatic?  6 <b>A. Yes.</b>  7 Q. So no Grande person is sitting there going  8 notice by notice and saying, "This one is good; send it  9 to the customer. This one is not good; don't send it"?  10 <b>A. That is correct.</b>  11 Q. Provided a notice satisfies the requirements  12 laid out in the DMCA policy, it's going to get  13 forwarded?  14 <b>A. Generally speaking, that is correct. I'm not</b>  15 <b>aware of any other situation.</b>  16 Q. Understood.  17 Prior to the implementation of the current  18 DMCA policy in February 2017, Grande was sending paper  19 notices of infringement but was not terminating  20 subscribers for copyright infringement; correct?  21 MR. HOWENSTINE: Objection. Vague.  22 <b>A. To answer that more accurately, I'd need the</b>  23 <b>time frame defined there.</b>  24 Q. (BY MR. O'BEIRNE) Sure.  25 So let's start in 2016. In 2016, Grande</p>

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36 (141 to 144)

141	<p>1 was still operating under the old system of CSG, sending</p> <p>2 out paper letters in response to notices of copyright</p> <p>3 infringement that Grande received; correct?</p> <p>4 <b>A. That is correct.</b></p> <p>5 Q. And Grande was not terminating subscribers for</p> <p>6 copyright infringement in 2016?</p> <p>7 <b>A. To my knowledge, that is correct.</b></p> <p>8 Q. Grande was not terminating subscribers for</p> <p>9 copyright infringement in 2015?</p> <p>10 <b>A. To my knowledge, that is correct.</b></p> <p>11 Q. Grande was not terminating subscribers for</p> <p>12 copyright infringement in 2014?</p> <p>13 <b>A. To my knowledge, that is correct.</b></p> <p>14 Q. Grande was not terminating subscribers for</p> <p>15 copyright infringement in 2013?</p> <p>16 <b>A. To my knowledge, that is correct.</b></p> <p>17 Q. Grande was not terminating subscribers for</p> <p>18 copyright infringement in 2012?</p> <p>19 <b>A. To my knowledge, that is correct.</b></p> <p>20 Q. Grande was not terminating subscribers for</p> <p>21 copyright infringement in 2011?</p> <p>22 <b>A. This is where I need to clarify that</b></p> <p>23 <b>somewhere -- and I don't have an exact date nor point of</b></p> <p>24 <b>reference to point to -- in 2010 or 2011, which I</b></p> <p>25 <b>believe was 2010, when we were previously managed by</b></p>	143	<p>1 to whether the practice of terminating subscribers was</p> <p>2 ongoing or not?</p> <p>3 <b>A. I am generally aware that we were shutting down</b></p> <p>4 <b>subscribers based on copyright violations, yes.</b></p> <p>5 Q. Prior to 2011?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. And then, after a change in policy in 2011,</p> <p>8 that practice ceased?</p> <p>9 <b>A. To the best of my knowledge, yes.</b></p> <p>10 MR. O'BEIRNE: Please bear with me a</p> <p>11 second. I got lost in my documents. We've been going</p> <p>12 about an hour five. Would now be a good time for a</p> <p>13 comfort break?</p> <p>14 MR. HOWENSTINE: Yes.</p> <p>15 MR. O'BEIRNE: Great.</p> <p>16 THE VIDEOGRAPHER: Time is 2:19 p.m. We're</p> <p>17 going off the record.</p> <p>18 (A recess was taken from 2:19 p.m.</p> <p>19 to 2:36 p.m.)</p> <p>20 THE VIDEOGRAPHER: Time is 2:36 p.m. We're</p> <p>21 back on the record.</p> <p>22 Q. (BY MR. O'BEIRNE) Mr. Horton, you understand</p> <p>23 you're still under oath?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. Did you discuss your testimony with anybody at</p>
142	<p>1 <b>ABB, we had a policy in place of turning off all</b></p> <p>2 <b>subscribers upon copyright violation notice, requiring</b></p> <p>3 <b>the customer to then contact Grande to discuss the</b></p> <p>4 <b>issue, understand what happened, inform the customer of</b></p> <p>5 <b>why they'd been shut off, and take appropriate action</b></p> <p>6 <b>from there. In 2010 or '11, in that time period, ABB</b></p> <p>7 <b>implemented a change to that policy.</b></p> <p>8 Q. After the change in policy that you recall was</p> <p>9 sometime in 2010 or 2011, Grande was not terminating</p> <p>10 subscribers for copyright infringement until the current</p> <p>11 DMCA policy in 2017?</p> <p>12 <b>A. To the best of my knowledge, that's true.</b></p> <p>13 Q. Prior to the change in policy that you recall</p> <p>14 occurred in 2010 or 2011, ABB was at least suspending</p> <p>15 customers for copyright infringement?</p> <p>16 <b>A. To be more accurate, Grande had always done</b></p> <p>17 <b>that up until that point. So Grande existed before ABB.</b></p> <p>18 <b>After ABB came in, a change was made to that policy.</b></p> <p>19 Q. I see.</p> <p>20 So Grande did terminate subscribers for</p> <p>21 copyright infringement prior to 2011?</p> <p>22 <b>A. Yes. And it -- it's hard for me to describe</b></p> <p>23 <b>exactly that process because that was a long time ago,</b></p> <p>24 <b>and I -- I was not involved in it directly at the time.</b></p> <p>25 Q. I understand. But you are generally aware as</p>	144	<p>1 the break?</p> <p>2 <b>A. No.</b></p> <p>3 Q. Okay. Let's proceed with some more questions.</p> <p>4 We were talking about Grande's historic treatment of</p> <p>5 allegations of copyright infringement. And I recall you</p> <p>6 talking about a change in policy that you estimated</p> <p>7 occurred between 2010 and 2011, sometime in that time</p> <p>8 frame.</p> <p>9 That's fair?</p> <p>10 <b>A. That's correct.</b></p> <p>11 Q. And when did ABB take over management</p> <p>12 responsibilities for Grande?</p> <p>13 <b>A. Late 2009. I want to say September of 2009.</b></p> <p>14 Q. So there was a period during which ABB was</p> <p>15 performing management services for Grande in which</p> <p>16 Grande continued to suspend all subscribers for which</p> <p>17 Grande received a notice of copyright infringement?</p> <p>18 <b>A. That is correct, to the best of my knowledge.</b></p> <p>19 Q. And, at some point in time after ABB took</p> <p>20 over, there was a policy change, and the practice of</p> <p>21 suspending or terminating subscribers who were repeat</p> <p>22 infringers ceased?</p> <p>23 <b>A. That is my understanding, yes.</b></p> <p>24 Q. And for the entire time we're discussing, late</p> <p>25 2009, 2010, 2011 and forward, you were in your current</p>



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37 (145 to 148)

<p style="text-align: right;">145</p> <p>1 role as VP?</p> <p>2 <b>A. Yes.</b></p> <p>3 (Exhibit 63 marked.)</p> <p>4 Q. (BY MR. O'BEIRNE) I'm handing you Plaintiffs'</p> <p>5 Exhibit 63. This is an email produced by Grande. There</p> <p>6 is a Bates number in the bottom right-hand</p> <p>7 corner; right?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. This email, Exhibit 63, is an email from</p> <p>10 Colin Bloch to you, dated October 25th, 2010; right?</p> <p>11 <b>A. It is.</b></p> <p>12 Q. The title of the email is "Systems Report,</p> <p>13 10/25/2010."</p> <p>14 Correct?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Did Mr. Bloch routinely send you systems report</p> <p>17 emails summarizing work that had occurred at or near the</p> <p>18 time of the -- of the email regarding different systems</p> <p>19 projects?</p> <p>20 <b>A. Yes. Generally as, like, a weekly report.</b></p> <p>21 Q. So this is a Monday one. Do you understand</p> <p>22 that was -- would have been describing what happened the</p> <p>23 week before or in the coming week or just in general</p> <p>24 around a week's time frame?</p> <p>25 <b>A. In general, around that week's time frame.</b></p>	<p style="text-align: right;">147</p> <p>1 <b>A. Yes.</b></p> <p>2 Q. And that's also what you were describing</p> <p>3 Prior to the change in policy, notices of infringement</p> <p>4 would go into a TSC queue for Grande to contact the</p> <p>5 customer regarding the copyright infringement.</p> <p>6 <b>A. More specifically, the customer would contact</b></p> <p>7 <b>us as to why their service was shut down. And that</b></p> <p>8 <b>ticket would be the representing information that the</b></p> <p>9 <b>TSC would then understand why the customer's service was</b></p> <p>10 <b>shut down.</b></p> <p>11 Q. Right. So Grande was shutting down the service</p> <p>12 and then, when the customer called to inquire as to why</p> <p>13 the service had been shut down, Grande would inform them</p> <p>14 about the copyright infringement information reflected</p> <p>15 in the TSC queue?</p> <p>16 <b>A. Correct.</b></p> <p>17 Q. You were aware that this was the process in</p> <p>18 place in October 2010?</p> <p>19 MR. HOWENSTINE: Objection. Vague.</p> <p>20 Q. (BY MR. O'BEIRNE) You can answer.</p> <p>21 <b>A. The process that changed? Is that what you're</b></p> <p>22 <b>saying?</b></p> <p>23 Q. Sorry. I'll -- I'll -- I'll ask it again.</p> <p>24 What Mr. Bloch is describing as the</p> <p>25 completed changes to the abuse management system were</p>
<p style="text-align: right;">146</p> <p>1 Q. Okay. The first bullet -- or I should --</p> <p>2 strike that.</p> <p>3 The email in Plaintiffs' Exhibit 63</p> <p>4 includes a numbered list of items.</p> <p>5 Do you see that?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. The first item, number 1, Mr. Bloch informs you</p> <p>8 (as read): Completed changes to the abuse management</p> <p>9 system to allow DMCA notices for residential customers</p> <p>10 to be placed in a queue, which will be processed by CSG</p> <p>11 for the purposes of sending out a letter.</p> <p>12 Do you see that?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. In October 2010, would this have been under the</p> <p>15 new policy of not terminating or suspending repeat</p> <p>16 infringers but sending out a paper letter from CSG?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. It goes on (as read): Provided a script that</p> <p>19 the CSG team can use to pull the data automatically.</p> <p>20 Do you see that?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. (As read): We have now stopped placing tickets</p> <p>23 in the TSC queue and all future DMCA notices will go out</p> <p>24 as letters from CSG.</p> <p>25 That's what it says; right?</p>	<p style="text-align: right;">148</p> <p>1 complete by October 25th, 2010; right?</p> <p>2 <b>A. To the best of my knowledge, reading this, yes,</b></p> <p>3 <b>I agree.</b></p> <p>4 Q. And does that refresh your recollection as to</p> <p>5 the time period in which the policy changed from</p> <p>6 terminating repeat infringers to not terminating repeat</p> <p>7 infringers?</p> <p>8 <b>A. Yes. And so when I said earlier 2010, 2011,</b></p> <p>9 <b>this looks like a refined date.</b></p> <p>10 Q. So you think it's fair to say it's about this</p> <p>11 time period, late 2010, when the policy changed from</p> <p>12 terminating repeat infringers to not terminating repeat</p> <p>13 infringers?</p> <p>14 <b>A. Yes, it would appear so.</b></p> <p>15 <b>To clarify that statement, we were -- we</b></p> <p>16 <b>were disconnecting all offenders, not just repeat</b></p> <p>17 <b>offenders.</b></p> <p>18 (Exhibit 64 marked.)</p> <p>19 Q. (BY MR. O'BEIRNE) I'm handing you Plaintiffs'</p> <p>20 Exhibit 64. This is an email from Waylon Endsley to</p> <p>21 you, dated February 14th, 2017; right?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Who is Mr. Endsley?</p> <p>24 <b>A. Waylon works as part of the billing team as a</b></p> <p>25 <b>database administrator.</b></p>

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72 (285 to 288)

<p style="text-align: right;">285</p> <p>1 <b>A. That appears to be his opinion in this email,</b></p> <p>2 <b>yes.</b></p> <p>3 Q. All right. Have you discussed this opinion</p> <p>4 with Mr. Creel?</p> <p>5 <b>A. I have not.</b></p> <p>6 Q. Are you aware of any decision Grande made to</p> <p>7 ignore notices from the company referenced here?</p> <p>8 <b>A. I am not.</b></p> <p>9 Q. Would you agree that it would be improper for</p> <p>10 Grande to refuse to accept notices from a particular</p> <p>11 source if they otherwise comply with the DMCA policy</p> <p>12 requirements?</p> <p>13 MR. HOWENSTINE: Objection. Calls for a</p> <p>14 legal conclusion.</p> <p>15 <b>A. Assuming they comply and there was nothing</b></p> <p>16 <b>unique that made people feel the need to get a legal</b></p> <p>17 <b>team to review, yes, we would process them.</b></p> <p>18 (Exhibit 89 marked.)</p> <p>19 Q. (BY MR. O'BEIRNE) I'm handing you Plaintiffs'</p> <p>20 Exhibit 89.</p> <p>21 MR. HOWENSTINE: How are we doing on time</p> <p>22 here?</p> <p>23 THE VIDEOGRAPHER: Got one hour left.</p> <p>24 Q. (BY MR. O'BEIRNE) Plaintiffs' Exhibit 89 is a</p> <p>25 document produced by Grande in this case; right?</p>	<p style="text-align: right;">287</p> <p>1 network?</p> <p>2 Do you see that?</p> <p>3 <b>A. I do.</b></p> <p>4 Q. Now, the date on this is Monday, October 10th,</p> <p>5 2016; right?</p> <p>6 <b>A. Uh-huh.</b></p> <p>7 Q. At that --</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Sorry. Let's just get that, again, clean.</p> <p>10 The -- the date on Arthur's question in</p> <p>11 PX 89 is October 10th, 2016; right?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. And he's asking, on October 10th, 2016, how</p> <p>14 many notices does a customer get before they're removed</p> <p>15 from the Grande network; right?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Now, the answer to that question on</p> <p>18 October 10th, 2016, is an unlimited amount of</p> <p>19 notices; right?</p> <p>20 <b>A. Technically, yes.</b></p> <p>21 Q. Not just technically. Actually; right?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. In every respect, the answer to that question</p> <p>24 is yes?</p> <p>25 MR. HOWENSTINE: Objection. Asked and</p>
<p style="text-align: right;">286</p> <p>1 <b>A. Yes.</b></p> <p>2 Q. It's an email from Mr. Fogle to you, on</p> <p>3 October 10th, 2016; right?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. And the earlier email in the chain is from</p> <p>6 Arthur DeLeon @mygrande.com.</p> <p>7 Do you see that?</p> <p>8 <b>A. I do.</b></p> <p>9 Q. Who is Arthur?</p> <p>10 <b>A. I'm going to assume he works in the call</b></p> <p>11 <b>center, but I do not know.</b></p> <p>12 Q. The To address that he sent this email to is</p> <p>13 @internetsystems or abbreviated ISYS@mygrande.com.</p> <p>14 Do you see that?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Who does that group email address go to?</p> <p>17 <b>A. I believe that goes to Colin, Sam, Lars, and</b></p> <p>18 <b>Rich.</b></p> <p>19 Q. And that's how Rich would have gotten it to</p> <p>20 forward it to you?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. And Arthur's question is (as read): Good</p> <p>23 morning. I had a simple question about the DMCA abuse</p> <p>24 notices that go out to customers. How many notices does</p> <p>25 a customer get before they are removed from Grande's</p>	<p style="text-align: right;">288</p> <p>1 answered.</p> <p>2 Q. (BY MR. O'BEIRNE) No?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Okay. So you would agree with me, in</p> <p>5 October 2016, there was no limit to the number of</p> <p>6 notices a Grande subscriber could receive --</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. -- before getting removed; right?</p> <p>9 <b>A. Yes. Yes.</b></p> <p>10 Q. Because Grande wasn't removing anybody?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Similarly, there was no limit to the number of</p> <p>13 notices a Grande subscriber could receive in</p> <p>14 2015; right?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Same for 2014?</p> <p>17 MR. HOWENSTINE: Objection. Asked and</p> <p>18 answered.</p> <p>19 <b>A. Yes. As we've covered earlier, yes.</b></p> <p>20 Q. (BY MR. O'BEIRNE) So, if Grande received</p> <p>21 25,000 notices regarding a particular subscriber, they</p> <p>22 would not have been kicked off in October 2016?</p> <p>23 MR. HOWENSTINE: Same objection.</p> <p>24 <b>A. Answer's still yes.</b></p> <p>25 Q. (BY MR. O'BEIRNE) Mr. Fogle forwards this</p>



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73 (289 to 292)

289	<p>1 question to you without further comment, just sends you</p> <p>2 the email. You see that; right?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. What was your response to him?</p> <p>5 <b>A. I do not recall.</b></p> <p>6 (Exhibit 90 marked.)</p> <p>7 Q. (BY MR. O'BEIRNE) I'm showing you Plaintiffs'</p> <p>8 Exhibit 90. This is an email produced by Grande in this</p> <p>9 case; right?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. It's GRANDE0000001?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. This is an email Mr. Fogle sent to</p> <p>14 Roberto Chang and Robert Creel in April 2013; right?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. He cc's Lars Christianson and Jimmy</p> <p>17 Quigley; right?</p> <p>18 <b>A. Yep. Yes.</b></p> <p>19 Q. And it's titled "DMCA Notices"; right?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. He says (as read): Roberto, Robby, we</p> <p>22 currently send out DMCA notifications through mail for</p> <p>23 what we take in with our abuse system.</p> <p>24 Do you see that?</p> <p>25 <b>A. I do.</b></p>	291
290	<p>1 (Exhibit 91 marked.)</p> <p>2 Q. (BY MR. O'BEIRNE) I'm handing you Plaintiffs'</p> <p>3 Exhibit 91. This is an email produced by Grande in this</p> <p>4 case; correct?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. It's Bates number GRANDE0000009; right?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. If you turn to the second page of Exhibit 91,</p> <p>9 at the bottom, you'll see that the original email in</p> <p>10 this chain is Mr. Fogle's email of April 11th,</p> <p>11 2013; right?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Turning back to the first page, the middle</p> <p>14 email of April 11th, from Mr. Chang, at 5:27 p.m., do</p> <p>15 you see that?</p> <p>16 <b>A. On the first page?</b></p> <p>17 Q. On the first page.</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Mr. Chang says (as read): Richard, who is</p> <p>20 responsible for the DMCA notification process? Do we</p> <p>21 call customers, question mark.</p> <p>22 Do you see that?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. He concludes his email (as read): If we do</p> <p>25 nothing more that emails, as I think you mentioned, we</p>	292


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74 (293 to 296)

<p style="text-align: right;">293</p> <p>1 might lose our safe harbor status.</p> <p>2 Do you see that?</p> <p>3 <b>A. I do.</b></p> <p>4 Q. What safe harbor do you understand him to be</p> <p>5 talking about?</p> <p>6 MR. HOWENSTINE: Objection. Calls for</p> <p>7 speculation.</p> <p>8 <b>A. I'm assuming he means the copyright safe harbor</b></p> <p>9 <b>for Internet providers.</b></p> <p>10 Q. (BY MR. O'BEIRNE) The DMCA safe harbor?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Mr. Fogle responds (as read): We aren't doing</p> <p>13 this today, from what I can gather.</p> <p>14 Do you see that?</p> <p>15 <b>A. I do.</b></p> <p>16 Q. And, again, as we've covered, Grande was not</p> <p>17 terminating anybody for copyright infringement in</p> <p>18 2013; right?</p> <p>19 <b>A. That is correct.</b></p> <p>20 Q. (As read): ISYS owns the DMCA abuse process.</p> <p>21 They provide what automation we have today. Snail mail</p> <p>22 warnings are automatically sent out by CSG from an</p> <p>23 upload process.</p> <p>24 That's what he explains; right?</p> <p>25 <b>A. Yes.</b></p>	<p style="text-align: right;">295</p> <p>1 <b>notification.</b></p> <p>2 Q. Are there any other responsibilities you're</p> <p>3 aware of that you have as Grande's DMCA agent?</p> <p>4 <b>A. Directly, no.</b></p> <p>5 Q. And just going back to your answer. So having</p> <p>6 your name on a piece of paper is sort of not a</p> <p>7 responsibility. That's -- that's just a fact. But are</p> <p>8 there any responsibilities that you have that flow from</p> <p>9 the fact that your name is on the DMCA policy?</p> <p>10 <b>A. Not directly, no.</b></p> <p>11 Q. In what respect, then, if not directly?</p> <p>12 <b>A. I would sim- -- just simply say that, you know,</b></p> <p>13 <b>my responsibility is to ensure that the systems we have</b></p> <p>14 <b>are running and are operated. Policy procedure is not</b></p> <p>15 <b>my responsibility.</b></p> <p>16 Q. I -- okay. I'm not sure I understand that.</p> <p>17 So are you testifying that, to the extent</p> <p>18 that Grande has a DMCA procedure, it's your</p> <p>19 responsibility, as the agent, to ensure that it's</p> <p>20 running?</p> <p>21 MR. HOWENSTINE: Objection. Misstates the</p> <p>22 testimony.</p> <p>23 <b>A. Please restate that.</b></p> <p>24 Q. (BY MR. O'BEIRNE) Yeah, sure. I'm just trying</p> <p>25 to understand what your -- what your testimony is.</p>
<p style="text-align: right;">294</p> <p>1 Q. Are you aware of any other conversations</p> <p>2 between Mr. Fogle and Mr. Chang regarding loss of the</p> <p>3 DMCA safe harbor in 2013?</p> <p>4 <b>A. I am not.</b></p> <p>5 Q. Did you have discussions with anybody at Grande</p> <p>6 about Grande's losing any purported protection from the</p> <p>7 DMCA safe harbor in 2013?</p> <p>8 <b>A. Not that I recall.</b></p> <p>9 MR. O'BEIRNE: Let's take a quick break.</p> <p>10 THE VIDEOGRAPHER: The time is 6:27 p.m.</p> <p>11 We're going off the record.</p> <p>12 (A recess was taken from 6:27 p.m.</p> <p>13 to 6:36 p.m.)</p> <p>14 THE VIDEOGRAPHER: The time is 6:36 p.m.</p> <p>15 We're back on the record.</p> <p>16 Q. (BY MR. O'BEIRNE) Mr. Horton, you understand</p> <p>17 you're still under oath?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Did you discuss your testimony with anybody at</p> <p>20 the break?</p> <p>21 <b>A. No.</b></p> <p>22 Q. What are your roles and responsibilities as</p> <p>23 Grande's DMCA agent?</p> <p>24 <b>A. I'm listed as the contact for third parties to</b></p> <p>25 <b>reach out to Grande in terms of DMCA and copyright</b></p>	<p style="text-align: right;">296</p> <p>1 <b>A. Sure.</b></p> <p>2 Q. So you mentioned your name is on the policy.</p> <p>3 We established that.</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. I'm asking: What's your understanding of your</p> <p>6 responsibilities for anything that flow from the fact</p> <p>7 that your name is on the policy?</p> <p>8 <b>A. From the fact that my name's on the policy, I</b></p> <p>9 <b>don't feel like anything is directly related to that</b></p> <p>10 <b>internally to Grande. I am a point of contact as an</b></p> <p>11 <b>agent; thus I have to be responsive to anything that</b></p> <p>12 <b>comes to me from that channel.</b></p> <p>13 <b>From a Grande employee perspective, I have</b></p> <p>14 <b>had the responsibility to ensure the system we have in</b></p> <p>15 <b>place is running and is operational.</b></p> <p>16 Q. When you say "Grande employee perspective," you</p> <p>17 mean what your employment responsibilities were prior to</p> <p>18 becoming the DMCA agent?</p> <p>19 <b>A. Generally speaking, as an operating engineer at</b></p> <p>20 <b>Grande, one of my responsibilities is to make sure our</b></p> <p>21 <b>systems function. One of those systems is the abuse</b></p> <p>22 <b>system.</b></p> <p>23 Q. Let me ask it a different way. There was a</p> <p>24 point in time in which you became the DMCA agent; right?</p> <p>25 <b>A. Yes.</b></p>

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Conducted on February 21, 2018

76 (301 to 304)

<p style="text-align: right;">301</p> <p><b>1 A. I do not recall seeing a report like this.</b></p> <p><b>2 Q.</b> Are you aware of Grande's ability to run such a</p> <p><b>3 report?</b></p> <p><b>4 A. Well, it's a logical assumption that if Grande</b></p> <p><b>5 provided this that we generated the report.</b></p> <p><b>6 Q.</b> I understand that. I'm not asking you to</p> <p><b>7 assume anything. I'm -- I'm asking you something a</b></p> <p><b>8 little different.</b></p> <p><b>9 I'm saying: What is your understanding of</b></p> <p><b>10 Grande's ability to generate a report like this?</b></p> <p><b>11 A. I think we've seen other examples today of</b></p> <p><b>12 being able to query the database and provide reports of</b></p> <p><b>13 this information.</b></p> <p><b>14 Q.</b> So is your testimony that whatever knowledge</p> <p><b>15 you have about reports like this has been gleaned</b></p> <p><b>16 sitting here with me, looking at exhibits I've been</b></p> <p><b>17 showing you?</b></p> <p><b>18 A. I would not quantify it that way.</b></p> <p><b>19 Q.</b> All right. So what -- what understanding do</p> <p><b>20 you have, sitting here today, about Grande's ability to</b></p> <p><b>21 generate this report?</b></p> <p><b>22 A. As I stated, we have the ability to generate</b></p> <p><b>23 these reports. We've seen examples of them today.</b></p> <p><b>24 Q.</b> Who generates them?</p> <p><b>25 A. I don't know why these reports are generated.</b></p> <p style="text-align: right;">302</p> <p><b>1 Q.</b> Do you see that, Plaintiffs' Exhibit 92, there</p> <p><b>2 is an Entity column on the right-hand side?</b></p> <p><b>3 A. I do.</b></p> <p><b>4 Q.</b> And Exhibit 92 lists, as specific account DMCA</p> <p><b>5 violations, numerous ticket numbers with the source</b></p> <p><b>6 entity as Rightscorp Inc.</b></p> <p><b>7 A. I do.</b></p> <p><b>8 Q.</b> Please bear with me for a second.</p> <p><b>9 MR. O'BEIRNE:</b> That's all the questions I</p> <p><b>10 have for Mr. Horton at this time. I pass the witness.</b></p> <p><b>11 MR. HOWENSTINE:</b> I have no questions of the</p> <p><b>12 witness.</b></p> <p><b>13 THE VIDEOGRAPHER:</b> The time is 6:47 p.m.,</p> <p><b>14 on February 21st, 2018. This completes the video</b></p> <p><b>15 deposition of Lamar Horton.</b></p> <p><b>16 THE REPORTER:</b> Would you like to order a</p> <p><b>17 copy of the transcript?</b></p> <p><b>18 MR. HOWENSTINE:</b> Yes, I would.</p> <p><b>19 (Deposition concluded at 6:47 p.m.)</b></p> <p><b>20</b></p> <p><b>21</b></p> <p><b>22</b></p> <p><b>23</b></p> <p><b>24</b></p> <p><b>25</b></p>	<p style="text-align: right;">303</p> <p><b>1 CERTIFICATE OF SHORTHAND REPORTER</b></p> <p><b>2 I, CANDICE ANDINO, the officer before whom the</b></p> <p><b>3 foregoing deposition was taken, do hereby certify that</b></p> <p><b>4 the foregoing transcript is a true and correct record of</b></p> <p><b>5 the testimony given; that said testimony was taken by me</b></p> <p><b>6 stenographically and thereafter reduced to typewriting</b></p> <p><b>7 under my direction; that reading and signing was not</b></p> <p><b>8 requested; and that I am neither counsel for, related</b></p> <p><b>9 to, nor employed by any of the parties to this case and</b></p> <p><b>10 have no interest, financial or otherwise, in its</b></p> <p><b>11 outcome.</b></p> <p><b>12 IN WITNESS WHEREOF, I have hereunto set my hand</b></p> <p><b>13 this 5th day of March, 2018.</b></p> <p><b>14</b></p> <p><b>15</b></p> <p style="text-align: center;"> CANDICE ANDINO TX CSR No. 9332, RMR</p> <p><b>16</b></p> <p><b>17</b></p> <p><b>18</b></p> <p><b>19</b></p> <p><b>20</b></p> <p><b>21</b></p> <p><b>22</b></p> <p><b>23</b></p> <p><b>24</b></p> <p><b>25</b></p>
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